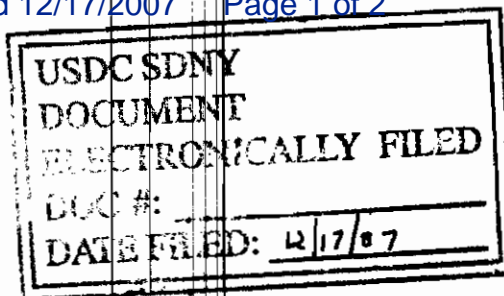


MEMO ENDORSEDUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK----- X
HOWARD K. STERN,

: Plaintiff,

: - against -

: RITA COSBY and HACHETTE BOOK GROUP :
: USA, INC., d/b/a Grand Central Publishing, and :
: JOHN or JANE DOE, :
: XDefendants.
-----~~PROPOSED~~ ORDER

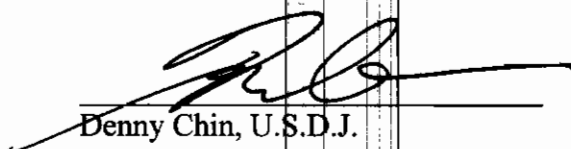
No. 07 Civ. 8536 (DC)

UPON the application of defendant Rita Cosby for a protective order prohibiting the public disclosure of the transcript and video of her deposition of November 15, 2007 and after a conference to address Ms. Cosby's request; the Court having considered the matter and for good cause having been shown, in accordance with the Memorandum Decision issued on December 12, 2007,

IT IS HEREBY ORDERED that:

- (1) Defendant Cosby's application for a protective order is granted;
- (2) The parties and their attorneys and other agents are hereby prohibited from releasing the video or transcript of Cosby's deposition or any excerpts or portions or copies thereof to the public absent further order of this Court;
- (3) Prior to the submission by any party of copies, excerpts, or portions of the transcript or videotape of Cosby's deposition to this or any other Court, counsel for the submitting party shall give reasonable notice to all parties, such that any party shall have the opportunity, prior to the submission, to move for an order requiring that the excerpt, portion, or copy be filed under seal;

(4) The parties and their attorneys and other agents shall take all reasonable precautions to ensure that all copies, excerpts, and portions of the video and transcript of Cosby's deposition are maintained in such a manner as to preclude the possibility of inadvertent dissemination to the public, until such time as this Court may make a further order.


Denny Chin, U.S.D.J.

12/17/07